

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Jackie Miles**

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**Dkt: 17 – 15520 – mdc**

**Chapter 13**

**Debtor's Objection to American Heritage Credit Union's  
Motion for Relief From the Automatic Stay**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Debtor avers that the mortgage is not delinquent as averred by movant.
6. Denied. Debtor avers that the mortgage is not delinquent as averred by movant.
7. Denied. Debtor avers that the mortgage is not delinquent as averred by movant.
8. Denied. Debtor avers that the mortgage is not delinquent as averred by movant.
9. Denied. Debtor avers that the mortgage is not delinquent as averred by movant.
10. Denied. Debtor avers that the mortgage is not delinquent as averred by movant.

WHEREFORE, Debtor respectfully requests that this Court deny American Heritage's Motion for Relief from the Automatic Stay.

Respectfully Submitted:

Date: July 27, 2020

/s/ Demetrius J. Parrish, Jr.  
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